

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER,
and STEINER ASSOCIATES, LLC)
)
)
Plaintiffs,)
)
)
v.)
)
)
EBAY, INC., et al.,)
)
)
Defendants.)
)
)
_____)

Civil Action No. 1:21-cv-11181-PBS

**NOTICE OF MOTION FOR PLAINTIFFS' MOTION TO DISMISS CLAIMS
AGAINST DEFENDANT JIM BAUGH PURSUANT TO FED. R. CIV. PRO. 41(a)(2)**

PLEASE TAKE NOTICE that Plaintiffs Ina Steiner, David Steiner, and Steiner Associates, LLC (collectively, "Plaintiffs") hereby move for an Order, pursuant to Fed. R. Civ. Pro. 41(a)(2), dismissing defendant Jim Baugh with prejudice. As grounds for this motion, Plaintiffs state as follows:

1. Because Plaintiffs and Mr. Baugh mutually desire to resolve their disputes by making a full and final settlement without additional litigation and the expenditure of time, effort, and expense, they have entered into a confidential Settlement Agreement effective as of March 26, 2025.

2. Counsel for Plaintiffs sought consent to dismiss Jim Baugh from all other defendants on April 4, 2025. It has been over twenty (20) days and the majority of defendants have not consented, necessitating the filing of this motion.

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion, dismiss Jim Baugh with prejudice, and grant such other and further relief as the Court deems just and proper.

Dated: April 25, 2025

Respectfully submitted,

/s/Andrew G. Finkelstein

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

Dated: April 25, 2025

/s/ Todd S. Garber
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